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Attornation for Defendance Olea Patratalan



Attorneys for Defendants Oleg Batratchenko; Thor United Corp.; Thor Optima LLC, Thor United Corp. (Nevis); Thor Asset Management, Inc.; Thor Real Estate Management, LLC; Thor Opti-Max, LLC; Thor Capital, LLC; Thor Futures, LLC; Thor Realty LLC and Thor Realty Holdings, LLC

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LUDMILA LOGINOVSKAYA,

Case No. 12-Civ.-0336 (JPO)

Plaintiff,

- against -

OLEG BATRATCHENKO, ALEXEI CHEKHLOV, PETER KAMBOLIN, THOR UNITED CORP., THOR OPTIMA LLC, THOR UNITED CORP. (NEVIS), THOR ASSET MANAGEMENT, INC., THOR REAL ESTATE MANAGEMENT, LLC, THOR OPTI-MAX, LLC, THOR CAPITAL, LLC, THOR FUTURES, LLC, THOR REALTY LLC, THOR REALTY HOLDINGS, LLC, SYSTEMATIC ALPHA MANAGEMENT, LLC (f/k/a THOR ASSET MANAGEMENT USA LLC), SYSTEMATIC ALPHA FUTURES, LLC (f/k/a THOR OPTIMA, LLC), and John Does 1-20,

STIPULATION ACCEPTING SERVICE AND ADJOURNING DEFENDANTS' TIME TO RESPOND TO THE COMPLAINT

Defendants.

It is hereby STIPULATED AND AGREED, by and between the parties hereto, as follows:

1. Defendants Oleg Batratchenko ("Batratchenko"); Thor United Corp.; Thor Optima LLC; Thor United Corp. (Nevis); Thor Asset Management, Inc.; Thor Real Estate Management, LLC; Thor Opti-Max, LLC; Thor Capital, LLC; Thor Futures, LLC; Thor Realty LLC and Thor Realty Holdings, LLC (hereafter, the "Thor Entities" and, together with Mr. Batratchenko, the "Batratchenko and the Thor Defendants") hereby accept service of the

Complaint as of the date of this Stipulation and, while expressly reserving all their other rights and defenses, hereby waive any and all objections to service of process, including but not limited to waiving any and all objections to in personam jurisdiction based on any defect in service of the Complaint; and

- Batratchenko's and the Thor Defendants' deadlines to respond to Plaintiff's 2. Complaint in the above-referenced action, which would otherwise have been between February 17 and March 23, 2012, are extended until May 30, 2012, which is the first adjournment of this deadline; and
- 3. This stipulation may be executed in counterparts and exchanged by PDF, fax or other electronic means and such electronic counterparts shall have the same effect as if a single document had been executed and a copy thereof shall be treated as if an original for all purposes.

Dated: New York, New York May 14, 2012

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